

REMARKS

This is in response to the Office Action mailed August 24, 2004. Applicants respectfully request reconsideration in light of the following arguments.

I. Preliminary Amendment

The Examiner noted that no preliminary amendments were filed. However, a preliminary amendment was filed on November 12, 2003. Applicants have attached a copy for the Examiner's reference.

II. Claims Rejected Under 35 USC §102(e)

The Examiner rejected claims 1-59 under 35 USC §102(e) as being anticipated by U.S. Publication No. 2004/0024812 ("Park"). To anticipate a claim, every element of the claim must be disclosed within a single reference. Applicants respectfully submit that Park fails in this regard.

A. Overview of Cited Art

Park discloses a web-based publication system that supports real-time integration and processing of dynamic data. Park, Abstract. The system includes a repository 8 which "is capable of integrating a plurality of static and dynamic content, in unit of containers." Park, ¶14 and Figure 1. A container is defined as a "single virtual page of a logical web site." Park, ¶41. Containers can be "stored in a directory 72 having a hierarchical structure, and the directory 72 may include one or more sub-directories." Park, ¶41 and Figure 5. The directory path in combination with an author's name is used to identify a container. Park, ¶74. A service publication server 4 fetches a container from the repository 8 in response to a content request received from a web server, and can access dynamic content using dynamic content access information included in the fetched container. Park, ¶14, Figures 1 and 5.

B. Claims 1 – 10

Claim 1 recites in part, integrating into the VCR each one of said plurality of content repositories whose authorization information indicates successful authorization; wherein

each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As discussed above in *Section A*, Park discloses integration of content – not repositories – in the form of virtual web pages. The relied upon portions of Park disclose a content request API 53 exposed by the service publication server 4 which accepts a request for a container 72 from a web server 62. Park, ¶58 and Figure 5. “Thereafter, the container transformation module 54 transforms the document in the XML format ... and transmits the transformed content (for example, HTML, HDML, or WML) to the web server 62 for the delivery to the device through the content request API 53.” Park, ¶60. Assuming for argument’s sake (but not conceding such) that the service publication server 4 is a content repository, the API 53 does not expose functionality for integrating the service publication server 4 into a virtual content repository.

For at least these reasons, claim 1 is not anticipated by Park. Claims 2 – 10 depend from claim 1. It follows that the dependent claims are not anticipated by Park for at least the same reasons.

C. Claims 11 – 20

Independent claim 11 recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace and wherein each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, Park does not disclose these features of Applicants’ claim 11.

Claim 11 further recites in part, extending a content model to include content from each one of said plurality of content repositories.

Park discloses the repository content manager 61 loads a container in the memory of the service publication server 4 and converts the container into a container document object model (DOM) object 55. Park, ¶59. Thereafter, the content transformation module 54 is provided with a document in an XML format from the container DOM object 55. Id. Assuming for argument’s sake (but not conceding such) that the DOM object is a content model, Park does not disclose extending it to include content from a plurality of content repositories – the DOM object represents a single container from a single repository.

Claim 11 further recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace.

As discussed above in *Section A*, containers can be “stored in a directory 72 having a hierarchical structure, and the directory 72 may include one or more sub-directories.” *Park*, ¶41 and Figure 5. Assuming for argument’s sake (but not conceding such) that a directory is a namespace, *Park* discloses that containers – not repositories – are stored in the directory 72.

For at least these reasons, claim 11 is not anticipated by *Park*. Claims 12 – 20 depend from claim 11. It follows that the dependent claims are not anticipated by *Park* for at least the same reasons.

D. Claims 21 – 29

Independent claim 21 recites in part, a namespace is hierarchical and spans said plurality of content repositories; and wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR).

In contrast to Applicants’ claim 21, *Park* discloses that a containers within a single repository 8 can be stored in a hierarchical directory structure. See *Section A* above. The directory structure in *Park* does not span a plurality of repositories.

Claim 21 also recites in part, wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR).

As argued above, *Park* does not disclose this feature.

For at least these reasons, claim 21 is not anticipated by *Park*. Claims 21 – 29 depend from claim 21. It follows that the dependent claims are not anticipated by *Park* for at least the same reasons.

E. Claims 30 – 39, 40-49 and 50-59

Independent claims 30, 40 and 50 recite in part, incorporating each one of said plurality of content repositories into a hierarchical namespace; extending a content model to include content from each one of said plurality of content repositories; and each one of said

plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, these features are not anticipated by Park. For at least this reason, claims 30, 40 and 50 are not anticipated by Park. Claims 31 -- 39 depend from claim 30. Claims 41-49 depend from claim 40. Claims 51-59 depend from claim 50. It follows that the dependent claims are not anticipated by Park for at least the same reason.

Conclusion

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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